

1  
2  
3  
4  
5  
6  
7  
8  
9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: CATHODE RAY TUBE (CRT)  
12 ANTITRUST LITIGATION

Master File No. M:07-5944-SC  
MDL No. 1917

13 This Document Relates to

Case No. 3:11-cv-05513-SC

14 *Electrograph Systems, Inc. et al. v. Hitachi, Ltd.,*  
15 *et al., No. 11-cv-01656;*

16 *Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;*

17 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*  
18 *No. 11-cv-05513;*

19 *Target Corp., et al. v. Chunghwa Picture Tubes,*  
20 *Ltd., et al., No. 11-cv-05514;*

21 *Interbond Corporation of America v. Hitachi, et*  
22 *al., No. 11-cv-06275;*

23 *Office Depot, Inc. v. Hitachi, Ltd., et al., No.*  
24 *11-cv-06276;*

25 *CompuCom Systems, Inc. v. Hitachi, Ltd. et al.,*  
26 *No. 11-cv-06396;*

27 *Costco Wholesale Corporation v. Hitachi, Ltd., et*  
28 *al., No. 11-cv-06397;*

*P.C. Richard & Son Long Island Corporation, et*  
*al. v. Hitachi, Ltd., et al., No. 12-cv-02648;*

*Schultze Agency Services, LLC v. Hitachi, Ltd.,*  
*et al., No. 12-cv-02649;*

**STIPULATION AND ~~[PROPOSED]~~  
ORDER EXTENDING THE  
DEADLINE TO FILE MOTION TO  
COMPEL LG ELECTRONICS, INC.  
AND LG ELECTRONICS USA, INC.  
TO RESPOND TO DIRECT  
ACTION PLAINTIFFS' FIRST SET  
OF REQUESTS FOR ADMISSION**

1 *Tech Data Corporation, et al. v. Hitachi, Ltd., et*  
*al., No. 13-cv-00157;*  
2  
3 *Sharp Electronics Corp., et al. v. Hitachi, Ltd., et*  
*al., No. 13-cv-01173;*  
4  
5 *Dell Inc. and Dell Products L.P. v. Hitachi, Ltd.,*  
*et al., No. 13-cv-02171;*  
6  
7 *Sharp Electronics Corp. et al. v. Koninklijke*  
8 *Philips Electronics, N.V., et al., No. 13-cv-*  
9 *02776;*  
10  
11 *Siegel v. Technicolor SA, et al., No. 13-cv-05261;*  
12  
13 *Sears, Roebuck and Co., et al. v. Technicolor SA,*  
14 *No. 13-cv-05262;*  
15  
16 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*  
17 *No. 13-cv-05264;*  
18  
19 *Schultze Agency Services, LLC v. Technicolor*  
20 *SA, et al., No. 13-cv-05668;*  
21  
22 *Target Corp., v. Technicolor SA, et al., No. 13-*  
23 *cv-05686;*  
24  
25 *Costco Wholesale Corporation v. Technicolor*  
26 *SA,, et al., No. 13-cv-005723;*  
27  
28 *Electrograph Systems, Inc., et al. v. Technicolor*  
*SA, et al., No. 13-cv-05724;*  
*P.C. Richard & Son Long Island Corporation, et*  
*al. v. Technicolor SA, et al., No. 13-cv-05725;*  
*Office Depot, Inc. v. Technicolor SA, et al., No.*  
*13-cv-05726;*  
*Interbond Corporation of America v. Technicolor*  
*SA, et al., No. 13-cv-05727.*  
*ViewSonic Corporation, v. Chunghwa Picture*  
*Tubes, Ltd., et al., 3:14cv-02510;*  
*The Indirect Purchaser Action.*

1 This Stipulation and Proposed Order Extending the Deadline to File Motion to Compel LG  
2 Electronics Inc. and LG Electronics USA, Inc. to Respond to Direct Action Plaintiffs' First Set of  
3 Requests for Admission between the Direct Action Plaintiffs (collectively "Plaintiffs"), on the one  
4 hand, and LG Electronics, Inc. and LG Electronics USA, Inc. (collectively, "LG"), on the  
5 other hand, is made with respect to the following facts and recitals:

6 WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of  
7 fact discovery for September 5, 2014. *See* Dkt. No. 2459;

8 WHEREAS, the deadline to file any motion to compel after the discovery cut-off is  
9 September 12, 2014 (L.R. 37-3);

10 WHEREAS, on August 1, 2014, the Plaintiffs served their First Set of Requests for  
11 Admission on LG;

12 WHEREAS, at the Request of LG, Plaintiffs agreed to an extension of time for LG to serve  
13 its Responses to Plaintiffs' First Set of Requests for Admission;

14 WHEREAS, the parties have continued to meet and confer to resolve their differences  
15 related to LG's forth-coming responses and have a bona fide intent to continue doing so;

16 WHEREAS, the Plaintiffs and LG have conferred by and through their counsel and,  
17 subject to the Court's approval, HEREBY STIPULATE AS FOLLOWS:

- 18 1. Plaintiffs will replace Exhibit A to their First Set of Requests for Admission with  
19 the revised list of documents previously provided by Plaintiffs to LG on August 29,  
20 2014 ("Revised Exhibit A");
  - 21 2. Subject to the parties' meet and confer discussion, LG will provide substantive  
22 responses on or before September 22, 2014, to Plaintiffs' First Set of Requests for  
23 Admission based on the Revised Exhibit A; and
  - 24 3. The undersigned parties agree to extend the deadline for the Plaintiffs to file a  
25 motion to compel relating to the Plaintiffs' First Set of Requests for Admission, to  
26 the extent one is deemed necessary by Plaintiffs, to September 29, 2014.
- 27  
28

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: October 2, 2014

Hon. Samuel Conti  
United States District Court Judge



DATED: September 12, 2014

**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**

By: /s/ Laura E. Nelson

Roman M. Silberfeld  
David Martinez  
Laura E. Nelson

*Attorneys for Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BESTBUY.COM, LLC; Magnolia Hi-Fi, LLC*

/s/ Philip T. Iovieno

Philip J. Iovieno  
Anne M. Nardacci

**BOIES, SCHILLER & FLEXNER LLP**

30 South Pearl Street, 11th Floor  
Albany, NY 12207

Telephone: (518) 434-0600

Facsimile: (518) 434-0665

Email: [piovieno@bsflp.com](mailto:piovieno@bsflp.com)  
[anardacci@bsflp.com](mailto:anardacci@bsflp.com)

William A. Isaacson

**BOIES, SCHILLER & FLEXNER LLP**

5301 Wisconsin Ave. NW, Suite 800

Washington, D.C. 20015

Telephone: (202) 237-2727

Facsimile: (202) 237-6131

Email: [wisaacson@bsflp.com](mailto:wisaacson@bsflp.com)

Stuart Singer

**BOIES, SCHILLER & FLEXNER LLP**

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Telephone: (954) 356-0011

Facsimile: (954) 356-0022

Email: [ssinger@Bsflp.Com](mailto:ssinger@Bsflp.Com)

*Liaison Counsel For Direct Action And Attorneys For Plaintiffs Electrograph Systems, Inc., Electrograph Technologies, Corp., Office Depot, Inc., Interbond Corporation Of America, P.C. Richard & Son Long Island Corporation, Marta Cooperative Of America,*

*Inc., Abc Appliance, Inc., Schultze Agency Services  
Llc On Behalf Of Tweeter Opco, Llc And Tweeter  
Nezvco, LLC  
Liaison Counsel For Direct Action Plaintiffs*

/S/ David J. Burman

David J. Burman (Pro Hac Vice)  
Cori G. Moore (Pro Hac Vice)  
Eric J. Weiss (Pro Hac Vice)  
Nicholas H. Hesterberg (Pro Hac Vice)  
Steven D. Merriman (Pro Hac Vice)  
**PERKINS COIE LLP**  
1201 Third Avenue, Suite 4900  
Seattle, Wa 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
Email: Dburman@Perkinscoie.Com  
Cgmoore@Perkinscoie.Com  
Eweiss@Perkinscoie.Com  
Nhesterberg@Perkinscoie.Com  
Smerriman@Perkinscoie.Com

Joren Bass, Bar No. 208143  
**PERKINS COIE LLP**  
Four Embarcadero Center, Suite 2400  
San Francisco, Ca 94111-4131  
Telephone: 415.344.7120  
Facsimile: 415.344.7320  
Email: Jbass@Perkinscoie.Com

*Attorneys For Plaintiff Costco Wholesale Corporation*

/S/ Robert W. Turken

Robert W. Turken  
Scott N. Wagner  
**BILZIN SUMBERG BAENA PRICE & AXELROD  
LLP**  
1450 Brickell Ave, Suite 2300  
Miami, Fl 33131-3456  
Tel: 305-374-7580  
Fax: 305-374-7593  
Email: rturken@bilzin.com  
swagner@bilzin.com

Stuart Singer  
**BOIES, SCHILLER & FLEXNER LLP**  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, Fl 33301  
Telephone: (954) 356-0011  
Facsimile: (954) 356-0022  
Email: ssinger@bsflp.com

William A. Isaacson  
**BOIES, SCHILLER & FLEXNER LLP**

5301 Wisconsin Ave. NW, Suite 800  
Washington, D.C. 20015  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131  
Email: wisaacson@bsfllp.com

Philip J. Iovieno  
Anne M. Nardacci  
**BOIES, SCHILLER & FLEXNER LLP**  
30 South Pearl Street, 11th Floor  
Albany, NY 12207  
Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
Email: piovieno@bsfllp.com  
anardacci@bsfllp.com

*Attorneys For Plaintiffs Tech Data Corporation And  
Tech Data Product Management, Inc.*

/s/ Kenneth S. Marks

Kenneth S. Marks  
Jonathan J. Ross  
Johnny W. Carter  
David M. Peterson  
**SUSMAN GODFREY L.L.P.**  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
Email: kmarks@susmangodfrey.com  
jross@susmangodfrey.com  
jcarter@susmangodfrey.com  
dpeterson@susmangodfrey.com

Parker C. Folse III  
Rachel S. Black  
Jordan Connors  
**SUSMAN GODFREY L.L.P.**  
1201 Third Avenue, Suite 3800  
Seattle, Washington 98101-3000  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
Email: pfolse@susmangodfrey.com  
rblack@susmangodfrey.com  
jconnors@susmangodfrey.com

*Attorneys For Plaintiff Alfred H. Siegel, As Trustee Of  
The Circuit City Stores, Inc. Liquidating Trust*

1 /s/ Jason C. Murray

Jason C. Murray (CA Bar No. 169806)

2 **CROWELL & MORING LLP**

515 South Flower St., 40th Floor

3 Los Angeles, CA 90071

Telephone: 213-443-5582

4 Facsimile: 213-622-2690

Email: jmurray@crowell.com

5 Jerome A. Murphy (pro hac vice)

6 Astor H.L. Heaven (pro hac vice)

**CROWELL & MORING LLP**

1001 Pennsylvania Avenue, N.W.

7 Washington, D.C. 20004

Telephone: 202-624-2500

8 Facsimile: 202-628-5116

9 E-mail: jmurphy@crowell.com

aheaven@crowell.com

10 *Attorneys for Target Corp. and ViewSonic Corporation*

11 Richard Alan Arnold

William J. Blechman

12 Kevin J. Murray

**KENNY NACHWALTER, P.A.**

201 S. Biscayne Blvd., Suite 1100

13 Miami, FL 33131

14 Telephone: 305-373-1000

Facsimile: 305-372-1861

15 Email: rarnold@knpa.com

wblechnan@knpa.com

16 kmurray@knpa.com

17 *Attorneys for Plaintiff Sears, Roebuck and Co. and*  
*Kmart Corp*

18 /s/ Michael P. Kenny

19 Michael P. Kenny

20 Debra D. Bernstein

Matthew D. Kent

21 **ALSTON & BIRD LLP**

1201 West Peachtree Street

22 Atlanta, Georgia 30309-3424

Telephone: (404) 881-7000

23 Facsimile: (404) 881-7777

Email: mike.kenny@alston.com

24 debra.bernstein@alston.com

matthew.kent@alston.com

25 James M. Wagstaffe, Esq. (SBN 95535)

26 **KERR & WAGSTAFFE LLP**

100 Spear Street, 18th Floor

27 San Francisco, California 94105-1576

Tel: (415) 371-8500

Facsimile: (415) 371-0500

28 Email: wagstaffe@kerrwagstaffe.com

*Counsel for Plaintiffs Dell Inc. and Dell  
Products L.P.*

/s/ Kenneth A. Gallo

Kenneth A. Gallo (pro hac vice)

Joseph J. Simons (pro hac vice)

Craig A. Benson (pro hac vice)

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

2001 K Street, NW

Washington, DC 20006

Telephone: (202) 223-7300

Facsimile: (202) 223-7420

Email: kgallo@paulweiss.com

jsimons@paulweiss.com

cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)

Jonathan A. Patchen (SBN 237346)

**TAYLOR & COMPANY LAW OFFICES, LLP**

One Ferry Building, Suite 355

San Francisco, California 94111

Telephone: (415) 788-8200

Facsimile: (415) 788-8208

Email: staylor@tcolaw.com

jpatchen@tcolaw.com

*Attorneys for Plaintiffs Sharp Electronics Corporation  
and Sharp Electronics Manufacturing Company of  
America, Inc.*



By: /s/ Miriam Kim

Miriam Kim

**MUNGER, TOLLES & OLSON LLP**

355 S. Grand Ave., 35<sup>th</sup> Floor

Los Angeles, CA 90071

Email: miriam.kim@mto.com

*Attorneys for Defendants LG Electronics,  
Inc. and LG Electronics U.S.A., Inc.*

\* \* \*

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.